

EXHIBIT B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,
Plaintiff,

vs.

Case No. 17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;
OTTOMOTTO, LLC; OTTO
TRUCKING LLC,
Defendants.

****CONFIDENTIAL - ATTORNEYS' EYES ONLY****

VIDEO DEPOSITION OF KEVIN MAHER
San Francisco, California
Tuesday, December 12, 2017
Volume I

REPORTED BY:
REBECCA L. ROMANO, RPR, CSR No. 12546
JOB NO. 2771230
PAGES 1 - 299

Page 1

1 statement with him during this conversation? 10:33:43

2 A. No.

3 Q. Do you recall having conversations with
4 any other Uber employees about ephemeral
5 communications, prior to receiving the legal hold 10:33:52
6 notice?

7 A. I'm sure I spoke about it with Matt near
8 the time when I started.

9 Q. Can you recall anything about that
10 conversation? 10:34:03

11 A. I recall Matt saying that -- referring to
12 the security team that we are a -- primarily a
13 Wickr shop. Meaning that that is the standard
14 communication tool of the security team.

15 Q. Anything else? 10:34:23

16 A. No.

17 Q. Now, with regard to this conversation
18 that you had with Mr. Clark after you received the
19 legal hold notice, what do you recall discussing
20 with him? 10:34:39

21 A. I recall him either ending an email or
22 telling our team that we could not discuss anything
23 relevant to the legal hold using Wickr.

24 Q. So with regard to your use of Wickr, how
25 did that change after you received the legal hold? 10:35:00

1 I, Rebecca L. Romano, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

4 That the foregoing proceedings were taken
before me at the time and place herein set forth;
5 that any witnesses in the foregoing proceedings,
6 prior to testifying, were administered an oath;
7 that a record of the proceedings was made by me
using machine shorthand which was thereafter
8 transcribed under my direction; that the foregoing
9 transcript is true record of the testimony given.

10 Further, that if the foregoing pertains to the
11 original transcript of a deposition in a Federal
12 Case, before completion of the proceedings, review
13 of the transcript [] was [x] was not requested.

I further certify I am neither financially
14 interested in the action nor a relative or employee
15 of any attorney or any party to this action.

16 IN WITNESS WHEREOF, I have this date
17 subscribed my name.

18
19 Dated: December 13, 2017
20
21
22

23 
24

Rebecca L. Romano, RPR,
25 CSR. No 12546